UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO IL 60604-3590

REPLY TO THE ATTENTION OF
SE-5J

ACTION MEMORANDUM

DATE: JUN 15 2000

SUBJECT: ACTION MEMORANDUM - Request for a Time Critical Removal Action at the Rawleigh Buildings in Freeport, Stephenson County, Illinois (Site ID# B5G4)

FROM: Fred Bartman, On-Scene Coordinator
Emergency Response Branch - Response Section II

THRU: Rick Karl, Chief R. Karl
Emergency Response Branch

TO: William E. Muno, Director
Superfund Division

I. PURPOSE

The purpose of this Memorandum is to request your approval to expend up to $ 1, 289,000 to mitigate threats to human health and the environment posed by the presence of uncontrolled hazardous substances at the Rawleigh Buildings in Freeport, Illinois. The proposed action is being taken pursuant to Section 104 (a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, due to the presence of abandoned drums, containers and tanks containing flammable liquids, corrosive waste, poisionous waste and solvents. Friable damaged asbestos, mercury and transformers containing PCBs are also present. The proposed action includes the characterization, decontamination, removal and disposal of waste. The proposed action is estimated to cost $1,289,000 of which $1,102,000 shall be used towards cleanup contractor costs. The proposed action is estimated to require 70 working days to complete.

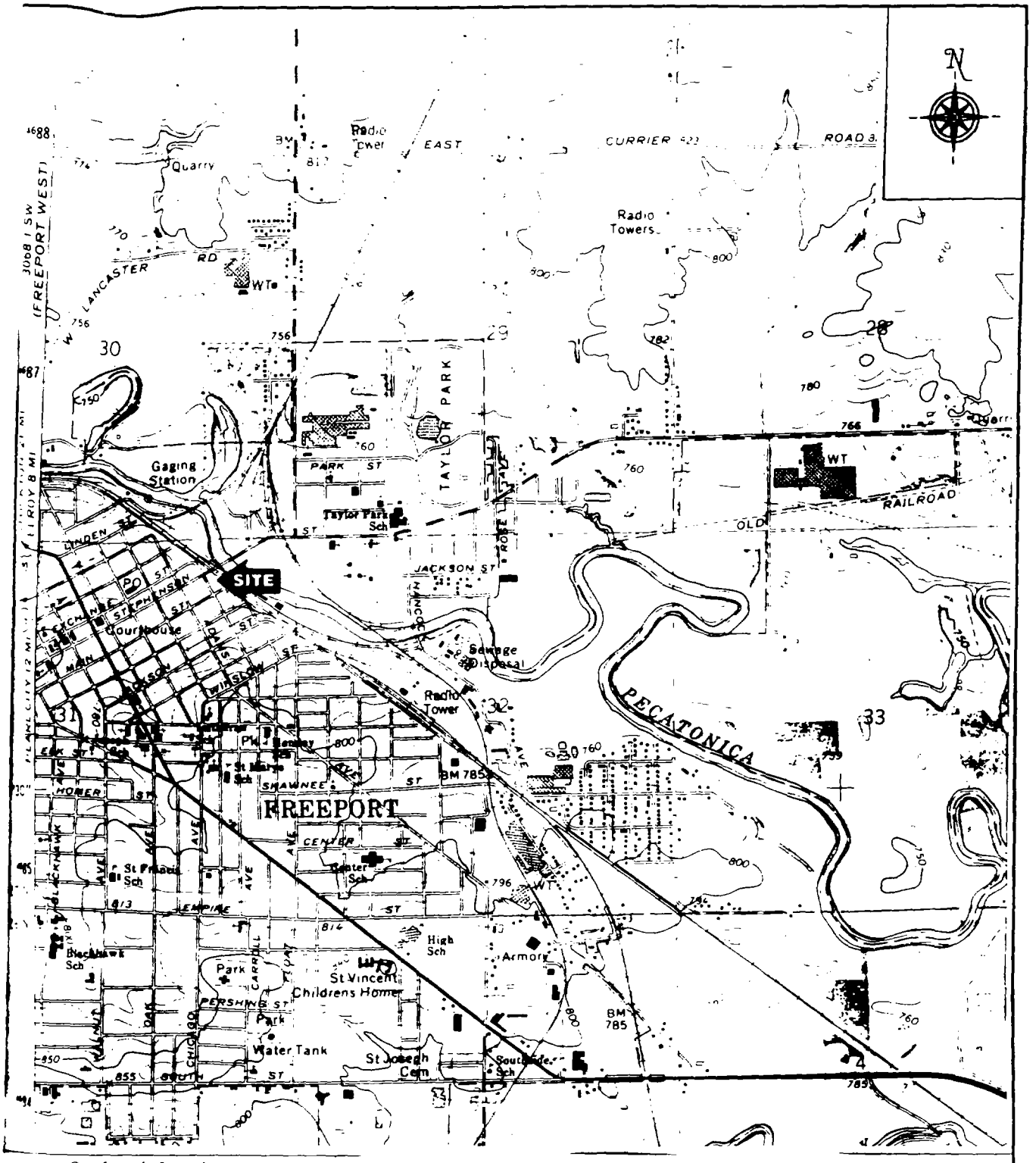
The site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

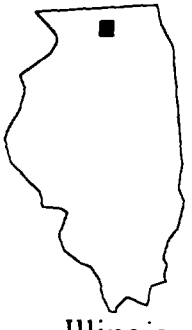
A. Site Description and History (CERCLIS # - ILSFN0508016)

The W.T. Rawleigh Company complex (Rawleigh Buildings) is located in the Freeport East quadrangle and the northeast quarter of Section 31, Township 27 North, Range 08 East, in the City of Freeport, Stephenson County, Illinois (Figure 1). The Rawleigh Buildings site is located on approximately two city blocks, bordered to the north by East Main Street, to the south by East Spring Street, to the west by South Adams Street, and to the east by the Chicago Central and Pacific Railroad. The site is divided into quarters by South Liberty Street from north to south and an alleyway from east to west (Figure 2).

A total of eight buildings are located on the site. Buildings 1, 2, and 3, reportedly constructed in 1904, 1912, and 1956, respectively, are six-story, brick interconnected, manufacturing and warehouse structures, with full basements, and are located on the northeast corner of the intersection of East Spring and South Liberty Streets. Building 4, reportedly constructed in 1912, is an eight-story, brick manufacturing and warehouse structure with a full basement and is located directly north of buildings 1, 2 and 3, on the northeast quarter of the site. Building 4 is connected to buildings 2 and 3 by an enclosed walkway on two floors and a small tunnel in the basement. Building 5 is an "L" shaped, six-story brick structure with a full basement, reportedly constructed in 1926 and used for manufacturing and warehouse purposes. This building is located on the southwest quarter of the site and is connected with enclosed walkways to building 2 on five floors and to Building 8 on one floor. Access to Building 8 via the walkway was boarded up. An additional four-story tower holding the plants water tanks is also part of this building. Building 6 is a one-story brick structure with a full basement, and reportedly constructed in 1924 as the power plant for the site. Building 6 is also interconnected with Building 5. A tunnel that contains piping from the power plant also exists from Building 6 to Building 1. This structure is located directly south of building 5 on the southwest quarter of the site. Building 7 is a one-story brick garage, reportedly constructed in 1934, and was utilized for the parking of W.T. Rawleigh executives. This structure is located directly north of Building 5 on the northwest quarter of the site. Building 8 is a two-story brick office building, reportedly constructed in 1954. This structure is located directly north of Building 5 on the southwest corner of the intersection of South Liberty and East Main Streets. U.S. EPA and ita technical support contractor (START) did not have access to Buildings 7 and 8 at the time of the site assessment. All remaining buildings on the site were inspected. A small asphalt paved parking lot is located between Buildings 7 and 8 on the northwest quarter of the site. The remaining portions of the site are covered with gravel and low-lying vegetation. Two residential structures that are not part of the site are located on the southeast corner of the intersection of East Main and South Adams Streets, directly adjacent to Building 7. No fence or other form of barrier is present around the perimeter of the site. The public has full access to the site and interior portions of the site buildings through several broken windows of Building 6 and at least two broken and unlocked doors located on the north and south sides of Building 5.



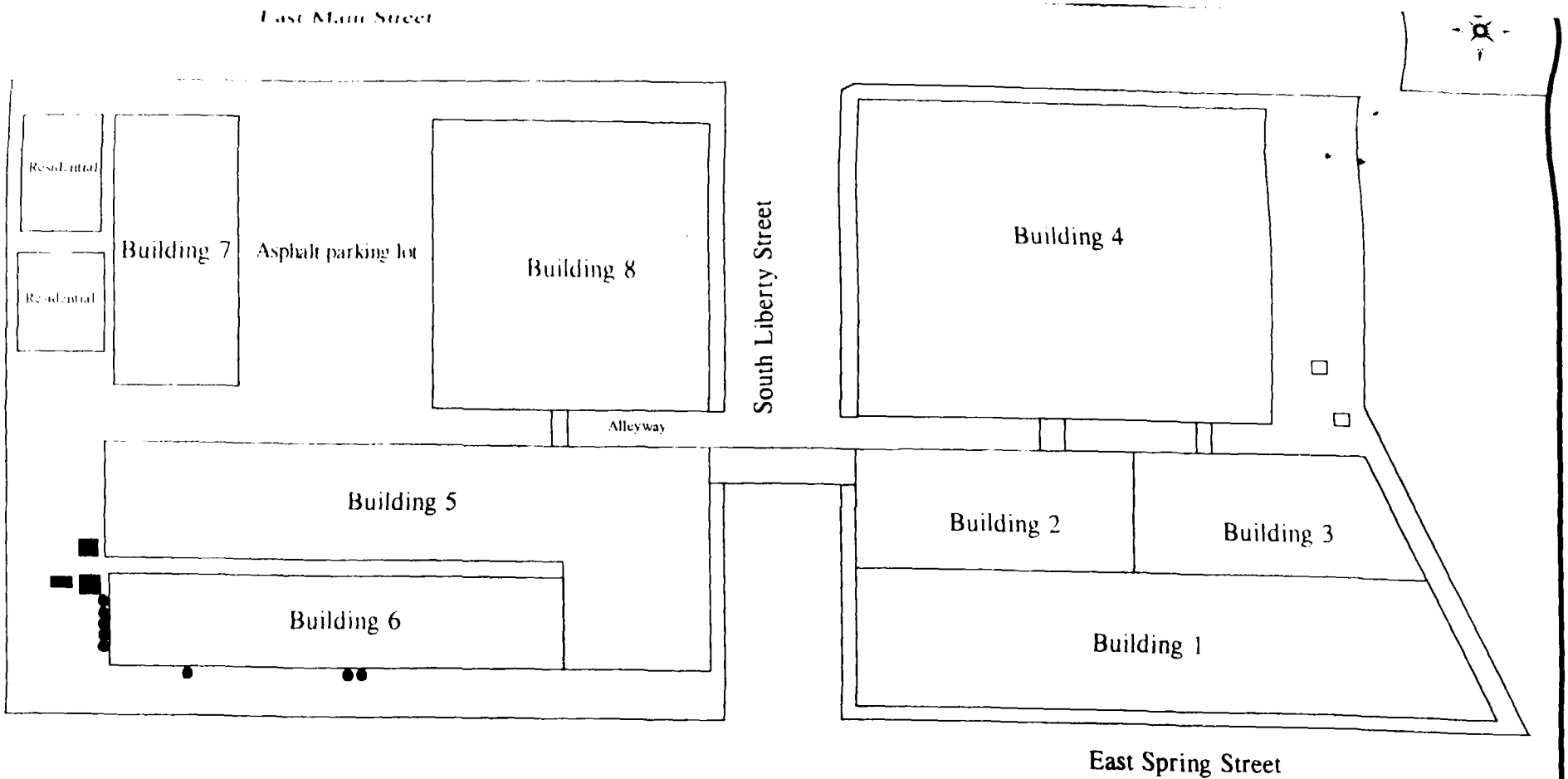
Quadrangle Location



EPA U.S. EPA Region 5

EMERGENCY AND ENFORCEMENT RESPONSE BRANCH

Title	Site Location Map	Figure	1
Site	Rawleigh Building	Scale	1:24000
City	Freeport State Illinois	TDD	S05-9910-003
Source	U.S.G.S. 7 5 Minute Series - Freeport East, Il Quadrangle	Date	1971, 1978



Legend

- Concrete UST manways
- Electrical padmounted transformers
- UST vent and fill pipes

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EMERGENCY AND ENFORCEMENT RESPONSE BRANCH

Title: Site Features Map	Figure: 2
Site: Rawleigh Building	Scale: Not to scale
City: Freeport State: Illinois	TDD: S05-9910-003
Source: Ecology and Environment, Inc	Date: February 24, 2000

A Phase I Environmental Assessment was conducted at the Rawleigh Building site by Mostardi Platt Associates, Inc. in January of 1992. This Phase I assessment found five environmental concerns regarding the site at that time. These concerns were the friable and non-friable asbestos-containing materials (ACM) such as thermal system insulation and floor tile found throughout the site buildings. A large quantity of potentially hazardous chemicals were found stored in various areas of the site buildings. Waste ash from incineration activities in building 6 and a total of ten underground storage tanks (USTs) were identified on the site along the eastern, western, and southern borders. In addition, at least 25 electrical transformers were found throughout the buildings.

The site was originally developed with several one- to three-story residential and commercial structures as denoted on the 1890 and 1897 Sanborn maps. On the 1904 Sanborn map the southeast quarter of the site was developed with Building 1 and two additional structures, all denoted as the W.T. Rawleigh Medical Company. The remaining portions of the site were denoted as vacant land or developed with residential and commercial structures. The 1910 Sanborn map denoted the presence of Buildings 1 through 3 on the southeast quarter of the site and was denoted as the W.T. Rawleigh Medical Company. The remaining portions of the site were denoted as vacant land or developed with residential and commercial structures. On the 1918 Sanborn map, the southeast and northeast quarters of the site were developed with Buildings 1 through 4 and denoted as the W.T. Rawleigh Medical Company. The remaining portions of the site were vacant land or developed with residential and commercial structures. On the 1925 Sanborn map the southeast and northeast quarters of the site remained unchanged. However, the southwest quarter of the site was developed with two one-story structures and denoted as a part of the W.T. Rawleigh Medical Company complex. The final Sanborn map, dated 1950, denoted the development of the southwest quarter of the site with Buildings 5 and 6, and Building 7 on the western half of the site. All were denoted as the W.T. Rawleigh Medical Company.

The W.T. Rawleigh Medical Company manufactured pet food, personal grooming supplies, dishwashing agents, and various cleaning products at portions of the site since at least 1904. In addition, portions of the site buildings have been used by other companies such as the Freeport Electrical Company, Freeport Hardwood Company, Honeywell Systems, and the Micro-Switch Company. The buildings have been vacant since at least 1988. No wastes are currently being generated on site. Building 7 is currently being used for the storage of several automobiles and other materials.

In September 1999, the Rawleigh Building site was referred to the Illinois EPA after a Freeport youth reportedly found and removed free-standing mercury from site Building 6 (power plant). Consequently, the youth's residence became contaminated with mercury and required an emergency cleanup, completed in October 1999, to decontaminate the residence. This action prompted U.S. EPA to conduct a removal site assessment of the Rawleigh Building site in November 1999. This site is also a potential Brownfields site. Consequently, the City of Freeport may have access to grant money and low cost loans from the State of Illinois.

B. Site Assessment

The site assessment was conducted on November 15 through 17, 1999. U.S. EPA On-Scene Coordinator (OSC) Fred Bartman and START members Eric Reuscher and John Nordine were on site to assess the property and collect samples. Photodocumentation of the site conditions is presented in Appendix B of the site assessment report. All buildings are constructed of masonry, with concrete, floor tile, wood, or brick floors. The walls and ceilings are painted plaster/drywall or concrete with approximately 50 fluorescent light fixtures per floor, per building. Visual inspection of the buildings revealed numerous piles of animal feces, trash and broken glass. Most of the floors were covered by lead paint chips and paper debris. Electricity and water have been disconnected from the buildings. Although the buildings appear structurally stable, some physical damage to the exterior of building 6 and to the enclosed walkway between building 5 and building 2 was noted.

Several ladders were observed throughout the buildings. Many appeared to have been deliberately placed and used by trespassing junk collectors for the purpose of cutting away asbestos-containing thermal system insulation to determine if overhead pipes are steel, iron, or copper. Some of the piping has been removed . In addition some of the metal components of the tranformers were also recently salvalged. It should be noted that while the site assessment was being conducted, two individuals were found walking the complex.

OSC Bartman and START entered the boiler room of building 6 and observed two areas where the word mercury was written on the floor indicating the location of a mercury spill. Several hundred droplets of mercury were observed in and around these two areas. Also observed was one waste medical syringe lying on the floor. An electrical switch control board and three electrical transformers were observed along the north wall of this room. Due to the age of Building 6 it is possible that these switches and transformers may contain polychlorinated biphenyls (PCBs). Three exterior electrical transformers are located on the southwest end of building 5 and approximately 22 additional floor or wall mounted electrical transformers are located on individual floors throughout buildings at the site.

START observed the storage of approximately 93 drums, ranging in size from 30 to 55 gallons, throughout the buildings, with the highest number of drums occurring on the first floor and basement of building 6, the basement of Buildings 1 and 2, and the first floor of Building 3. In addition, hundreds of smaller containers of 20 gallons or less were observed throughout the buildings, the majority of these containers being found in the basement of Building 6 and Buildings 1 and 2. These drums ranged in construction material from steel to plastic and from good to very poor condition.

On the 5th floor of Building 1, START observed a large number of open and unopened one gallon or less sized containers. These contained test samples of different pet care products produced by

the W.T. Rawleigh Company. In addition, a smaller room on the 5th floor was observed to have been a test sample storage room containing several small containers of "double action insect killer", pet shampoo, and pet deodorizer. A third room appeared to be a laboratory chemical storage room, containing several hundred small jars of various chemicals including hydrophosphorous acid, sulfuric acid, alcohols, two compressed gas cylinders labeled chlorine gas, and three compressed gas cylinders labeled sulfur dioxide. These areas showed evidence of being vandalized at the time of the site assessment. Jars, bottles, boxes of paper products and other containers were broken or scattered throughout the floor.

The site assessment also confirmed the presence of a total of ten USTs located on the site. Five fill and vent pipes, reported to be associated with 250-gallon USTs and to have contained solvents, were observed along the west wall of Building 6. Three vent and fill pipes reported to be associated with 10,000-gallon fuel oil USTs were observed along the south wall of Building 6. In addition, two concrete pads with vent pipes and manways, and reportedly associated with a 10,000-gallon kerosene and a 10,000-gallon ammonia UST, were observed along the east wall of Building 4. Most of the information above was obtained from the Phase I report.

A total of twenty-eight aboveground storage tanks (ASTs) were identified throughout the buildings. Tanks 1 through 9 appear to be 200 to 2,000 gallon ASTs, located on the first floor and basement of Building 6. These ranged from steel water tanks with suspect asbestos-containing jackets to plastic water tanks that appeared to part of a water filtration system located a small room on the first floor of Building 6. Tank 10 is an approximately 1,000-gallon AST located in the northwest corner of the basement of Building 5. All remaining ASTs are located in the basement of Building 4. Tanks 11 and 12, are 30,000-gallon rectangular ASTs, labeled "Bronco Solvent" and "coconut oil" respectively, and both appear to be empty. Tanks 13 through 24 are 3,200-gallon ASTs located in rows in the northeast portion of the basement. Tanks 13 and 15 are labeled "Pyrethro"; tanks 16, 17, and 19 are labeled kerosene; tanks 18 and 20 are labeled repellent; and tank 24 is labeled DDT. Tanks 25 through 28 are 10,000-gallon ASTs, located in a room directly south of tanks 13 through 24. Tank 26 was labeled as "mineral oil", tank 27 was labeled as "mineral seed oil", and tank 28 was labeled as "mineral seal oil".

Other potential hazards include the contents of the drums located throughout the site. These hazards were confirmed by labels found on the drums and containers. These hazardous chemicals and substances include poisons, chlorinated solvents, flammables, acids, and formaldehyde.

A total of 12 samples were collected on November 16th, 1999, and sampling activities were conducted by START in level B Personal Protection Equipment (PPE). Four suspect ACM samples were collected from the first floor and basement of Building 6. A total of six samples were collected from various drums located on the first floor and basement of Building 6, basement of Building 1, and the first floor of building 3. Three drums were sampled for pH, one drum for formaldehyde, one drum for flash point, semivolatile and volatile organic compounds, and one drum for semivolatile and volatile organic compounds. In addition, START measured

the depth of product in the kerosene UST-1 at 2 feet and 10 inches. A sample was then collected from this UST-1. The sample appeared to be a clear yellow liquid with a petroleum odor. This sample was to be analyzed for flash point, and semivolatile and volatile organic compounds. One sample for flash point, pesticides, and semivolatile and volatile organic compounds was collected from tank 13, located in the basement of building 4.

Analytical results of drum sample D041, located on the first floor of Building 3, contained 1,610 micrograms per liter (μg/L) of formaldehyde. Analytical results indicated that drum sample D002 was a base with a pH of 12.5 standard units, and drum sample D003 and D093 were acids, each with a pH of less than 1 standard unit. Drum samples D069 and D070 were analyzed for volatile organic compounds (VOCs) and flash point. In addition, sample D069 was analyzed for semivolatile organic compounds (SVOCs). Sample D069 was determined to have a flash point of less than 81 degrees Fahrenheit and sample D070 was determined to have a flash point of 91 degrees Fahrenheit. No VOCs or SVOCs were detected in these two samples. Methylnaphthalene, at a concentration of 5,510 milligrams per liter (mg/L) and naphthalene, at a concentration of 850 mg/L were detected in sample UST-1, along with a flash point of greater than 201 degrees Fahrenheit. Total petroleum hydrocarbons (TPH [DRO/GRO]) were detected at a concentration of 967,000 ppm in sample UST-1. Analytical results for sample T013 show methylnaphthalene at a concentration of 5,060 mg/L.

C. Current Site Conditions

The buildings have been boarded up by the City of Freeport to temporaraly limit access to the building. The buildings have been targeted as a Brownfields for possible future developement by USEPA and the City of Freeport. The City of Freeport is also eligible for low interest loans as part of the Illinois First Program. The State of Illinois does not have the resources to fully respond to this site. They will continue to assist USEPA.

An environmental justice (EJ) analysis (Attachment I) was also performed around the site. Within a one quarter mile radius of the site, the population is 273 of which 58% are considered low income and 25% are minorities. The site exceeds EJ case criteria for low income because low income percentile exceeds two times the state average. The average for Illinois is 27%.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions present at the Rawleigh Building site which warrant an appropriate removal action as set forth in paragraph (b) (2) of Section 300.415 of the National Oil and Hazardous Substances Contingency Plan (NCP) include:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

Local residents and children have access to hazardous materials at the site. Documented vandalism and observation of unauthorized individuals walking through buildings during the site inspection indicate accessability at the site. Trespassers may come in contact with acutely toxic, corrosive, poisonous and flammable chemicals found in various portions of the site. Free-standing metallic mercury and friable ACM were documented as being present at the site.

Per the August 1997 Toxicological Profile for Mercury, drafted by the Public Health Service Agency for Toxic Substances and Disease Registry (ASTDR), metallic mercury can enter the body by inhalation and ingestion. Exposure to sufficiently high levels can permanently damage a person's brain, kidneys, and a developing fetus. Short-term exposure to high levels of metallic mercury vapor in the air can damage the lungs, cause nausea, vomiting, or diarrhea, cause increases in blood pressure or heart rate, and cause skin rashes or eye irritation.

Per the August 1995 Toxicological Profile for Asbestos, drafted by ASTDR, asbestos enters the human body by inhalation or ingestion. Asbestos is considered a known human cancer-causing substance with a prolonged latency period between 10 and 40 years. The inhalation of asbestos fibers has been shown to cause the buildup of scare tissue in the human lung, which may lead to the development of a fatal form of human cancer called asbestosis.

Additional consideration should be given to emergency response personnel, such as police and fire fighters, who are likely to respond to emergencies at the facility and are likely to receive chemical exposure.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, may pose a threat of release.

The Rawleigh Building complex has numerous tanks and drums containing materials that are acutely toxic, carcinogenic, and flammable. Many drums in the complex are in a deteriorated condition, showing signs of rust, leaking and/or physical damage. The integrity of the USTs and ASTs is also in question. Many of these tanks still contain hazardous material. An additional concern is the presence of hundreds of containers of unknown substances, laboratory chemicals, and two compressed gas

cylinders labeled chlorine gas and three cylinders labeled sulfur dioxide on the 5th floor of buildings 1 and 2.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

Weather conditions may cause further deterioration of drums, tanks and other containers holding hazardous materials stored on site, leading to releases of these materials. Rain events through broken windows and leaking roofs, along with freezing and thawing of containers, could cause a rupture and release of container contents to the environment.

Threat of fire or explosion.

Large amounts of combustible material such as paper and several flammable substances were identified on site, including isopropanol and kerosene. If exposed to an ignition source, these substances could ignite or explode. Incompatible materials, including acids and bases, were observed stored in close proximity. If these incompatible materials were to come into contact with one another, the resulting reaction could cause fire or explosion. In the event of a fire or explosion, a toxic plume, consisting of asbestos, lead (paint chips), mercury (switches), PCB's (transformers and light ballasts), and combustion products of drums could impact the surrounding businesses and residents of Freeport.

IV. ENDANGERMENT DETERMINATION

The current site conditions and the presence of flammable, corrosive, poisonous and toxic waste pose serious threats to human health and the environment through direct contact, ingestion, inhalation and a potential fire and explosion hazard.

The actual or threatened releases of this hazardous substances, if not addressed by implementing the response action proposed in this Action Memorandum, may present an imminent and substantial threat to public health, or welfare, or the environment.

V. PROPOSED WORK AND ESTIMATED COSTS

Specifically, the following activities are proposed:

- Develop and implement site security measures during course of removal.
- Develop and implement site workplan and health and safety plan.
- Sample and analyze all pipes, soils, containers, drums, transformers, capacitors, above

and underground tanks, vats, drains and any other suspected contaminated areas.
- Confirm hazardous waste categories as necessary and take composite sample to arrange for transportation and disposal.
- Remove and dispose all damaged friable asbestos using a certified Asbestos removal contractor.
- Remove and dispose of capacitors and transformers containing polychlorinated biphenyls (PCBs).
- Remove all underground and above ground tanks. If removal is not possible decontaminate and render them useless.
- Package and ship wastes for treatment and/or disposal at a RCRA, CERCLA, TSCA approved facility. All off-site disposal will be conducted in accordance with the USEPA Off-Site Rule, 40 CFR 300.440.58 Federal Register 49215 (Sept. 22, 1993), and with any other state requirements.

The OSC has begun planning for the provision of post-removal site control, consistent with the provisions of § 300.415(k) of the NCP. The nature of the removal, elimination of all removal threats, is, however, expected to eliminate or minimize the need for post-removal site control. No long term remedial actions are planned at this time. It should be noted that upon completion of this removal action approximately 10,000 feet of undamaged friable asbestos and an unknown quantity of lead based paint chips will need to be removed prior to any demolition.

Onsite treatment of hazardous substances found at the site is not cost effective or practical because of the small quantity of waste. The additional start up and equipment costs would not be offset by transportation and disposal savings.

The estimated project cost ceiling is summarized below. A cost breakdown (Attachment II) is also attached.

EXTRAMURAL COSTS

Cleanup Contractor

Labor	$271,810
Equipment	$273,273
Other Direct Costs	$325,618
Analytical	$ 46,882
Subtotal	$917,583
20% Site Contingency	$183,516
TOTAL, EXTRAMURAL COSTS:	$ 1,101,099

INTRAMURAL COSTS:

U.S. EPA Direct Costs $30/hr x (1100 Regional + 110 HQ hrs)	$ 36,300
U.S. EPA Indirect Costs $61/hr x (1210 hrs)	$ 73,810
Subtotal	$110,110
START (1210hrs)	$ 36,300
Per diem	$10,000
Subtotal	$156,410
20% Site Contingency	$31,282
TOTAL, INTRAMURAL COSTS	$ 187,692
TOTAL REMOVAL PROJECT CEILING ESTIMATE	$ 1,288,791

The response actions described in this Memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the RB site which may pose direct contact, ingestion, and inhalation threats to public health and safety and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements (ARARS)

All applicable, relevant, and appropriate requirements (ARARS) will be complied with to the extent practicable. Federal ARARS for this site include RCRA and TSCA. As the materials being dealt with are likely to be RCRA characteristic or listed wastes, they will be handled accordingly. To the degree materials are treated on-site, treatment will meet RCRA land disposal restrictions found in 40 CFR § 268. To the degree materials are sent off site, wastes will be sent to a RCRA or TSCA permitted facility and RCRA manifesting requirements will be complied with for all waste streams. The materials will be sent to an acceptable RCRA treatment, storage, and/or disposal facility pursuant to the U.S. EPA Off-Site Rule.

VI. CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED

Given the site conditions, the nature of the hazardous substances documented on site, and the potential exposure pathways to nearby populations described in sections II and III above, actual or threatened releases of hazardous substances from the RB site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an

imminent and substantial endangerment to public health, or welfare, or the environment.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site

VIII. ENFORCEMENT

For administrative purposes, information concerning confidential enforcement strategy for this site is contained in the Confidential Enforcement Addendum.

VIII. RECOMMENDATION

This decision document represents the selected removal action for the Raleigh Buildings site, located in Freeport, Stephenson County, Illinois and developed in accordance with CERCLA, as amended by SARA, and not inconsistent with the NCP. This decision is based upon the Administrative Record for the site. Attachment III identifies the items that comprise the Administrative Record upon which the selection of the removal is based.

Because the conditions at the site meet the NCP § 300.415(b)(2) criteria for a time critical removal action, your approval of this request is recommended. The estimated total project costs are $ 1,289,000 of which up to $ 1,102,000 may be used for cleanup contractor costs. You may indicate your decision by signing below:

APPROVE: _____ DATE 6/9/00
William E. Muno, Director
Superfund Division

DISAPPROVE: _____ DATE_____
William E. Muno, Director
Superfund Division

Confidential Enforcement Addendum

Attachments

1. Administrative Record Index
2. Environmental Justice Analysis

cc: Kevin Mould, U.S. EPA, OERR, 5202-G
Michael Chezik, U. S. Department of Interior
Tom Skinner, Director, Illinois Environmental Protection Agency
Steve Davis, Illinois Department of Natural Resources
Jim Clark, IEPA (Maywood)

ENFORCEMENT ADDENDUM

REDACTED

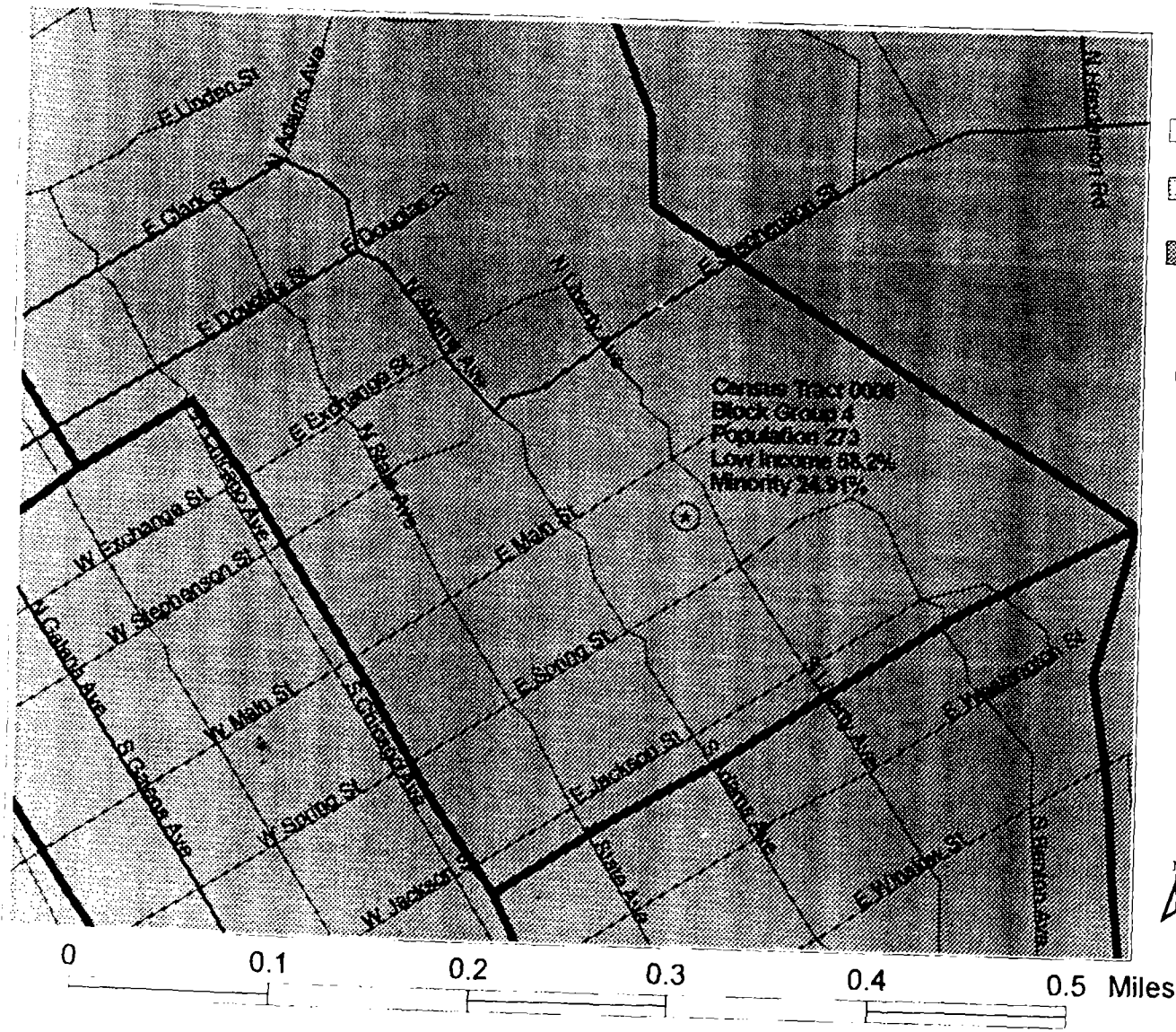
1 PAGE

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 1

Region 5 Superfund EJ Analysis

Raleigh Building Site Freeport, Illinois



EJ Identification

- Low Income and Minority Less than State Average
- Low Income or Minority at or Greater than State Average
- Low Income or Minority 2 Times or Greater than State Average
  [meets Region 5 EJ Case criteria]
- Site Location
- Block Group Boundary

Region 5 EJ Case Criteria for Illinois
Minority: 50% or greater
Low Income: 54% or greater

U.S. EPA Region 5
Superfund GIS

Date of Map 04/26/00

Source of Map 1990 Census Database

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ATTACHMENT III

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
RAWLEIGH BUILDINGS SITE
FREEPORT, STEPHENSON COUNTY, ILLINOIS

ORIGINAL
MAY 1,2000

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	01/17/92	Mostardi-Platt Associates, Inc.	D.G. Parker & Company	Phase I Environmental Assessment Report for the Rawleigh Building Site	63
2	08/02/93	Senneff, W., City of Freeport Fire Department	City of Freeport/ Stephenson County	Affidavit of William Senneff re: Rawleigh Complex	2
3	02/28/00	Ecology and Environment, Inc.	U.S. EPA	Site Assessment Report for the Rawleigh Building Site	114
4	00/00/00	Bartman, F., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request for a Time-Critical Removal Action at the Rawleigh Buildings Site **(PENDING)**	

ATTACHMENT II

Cost Summary

Projection Name: Rawleigh Asbestos
Projection Type: Initial

Date: 02.28/00
Prime Contractor: ETIS

		Projection	Archive	Total
CONTRACTOR				
	Personnel Cost	83430	0	83430
	Equipment Cost	41640	0	41640
	Other Direct Cost	69960	0	69960
	Total for Contractor	195030	0	195030
	Contractor Contingency: 0.00%			0
	Including Contractor Contingency			195030
	Site Contingency: 20.00%			39006
	Including Site Contingency			234036
GOVERNMENT				
	Personnel Cost	24000	0	24000
	Equipment Cost	0	0	0
	Other Direct Cost	18462	0	18462
	Total for Goverment	42462	0	42462
	Site Contingency: 20.00%			8492
	Including Site Contingency			50954
PROJECT TOTAL				284990

Cost Summary by Task Code

Projection Name: Rawleigh Asbestos
Projection Type: Initial

Date: 02/28/00
Prime Contractor: ETIS

	Personnel Cost	Equipment Cost	Other Cost	Total Cost
Task: Administrative (06) 01/01/00 - 01/31/00				
Contractor Projection:	28650	5659	6322	40631
Contractor Archive:	0	0	0	0
Task: Administrative / Admin (0602) 01/01/00 - 01/31/				
Government Projection:	24000	0	18462	42462
Government Archive:	0	0	0	0
Task: Operations (13) 01/01/00 - 01/31/00				
Contractor Projection:	54780	35981	63638	154399
Contractor Archive:	0	0	0	0
(Contractor Subtotals:)	83430	41640	69960	195030
(Government Subtotals:)	24000	0	18462	42462

CONTRACTOR

(Contractor Contingency:0.00%)	0	0	0	0
(Including Contractor Contingency)	83430	41640	69960	195030
(Site Contingency:20.00%)	16686	8328	13992	39006
(Including Site Contingency)	100116	49968	83952	234036

GOVERNMENT

(Site Contingency:20.00%)	4800	0	3692	8492
(Including Site Contingency)	28800	0	22154	50954

PROJECT TOTAL

	128916	49968	106106	284990

Cost Summary

Projection Name: Rawleigh Non-ACM
Projection Type: Initial

Date: 12/28/00
Prime Contractor: ETIS

	Projection	Archive	Total
CONTRACTOR			
Personnel Cost	188380	0	188380
Equipment Cost	231633	0	231633
Other Direct Cost	255658	0	255658
Total for Contractor	675671	0	675671
Contractor Contingency: 0.00%			0
Including Contractor Contingency			675671
Site Contingency: 20.00%			135134
Including Site Contingency			810805
GOVERNMENT			
Personnel Cost	50250	0	50250
Equipment Cost	0	0	0
Other Direct Cost	46882	0	46882
Total for Goverment	97132	0	97132
Site Contingency: 20.00%			19426
Including Site Contingency			116558
PROJECT TOTAL			927364

Cost Summary by Task Code

Projection Name: Rawleigh Non-ACM | Date: [illegible]
Projection Type: Initial | Prime Contractor: ETIS

	Personnel Cost	Equipment Cost	Other Cost	Total Cost
Task: Administrative (06) 02/01/00 - 03/31/00				
Contractor Projection:	65520	10648	13797	90065
Contractor Archive:	0	0	0	0
Task: Administrative / Admin (0602) 02/01/00 - 03/31/				
Government Projection:	50250	0	46882	97132
Government Archive:	0	0	[illegible]	0
Task: Operations (13) [illegible]				
Contractor Projection:	[illegible]	[illegible]	[illegible]	585[illegible]
Contractor Archive:	0			[illegible]
(Contractor Subtotals:)	188380	231633	255658	675671
(Government Subtotals:)	50250	0	46882	97132

CONTRACTOR
==========

	Personnel Cost	Equipment Cost	Other Cost	Total Cost
(Contractor Contingency: 0.00%)	[illegible]		[illegible]	[illegible]
(Including Contractor Contingency)	188380	231633	255658	675671
(Site Contingency: 20.00%)	[illegible]	46327	[illegible]	135134
(Including Site Contingency)	22[illegible]56	277960	306790	810805

GOVERNMENT
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	Personnel Cost	Equipment Cost	Other Cost	Total Cost
(Site Contingency: 20.00%)	[illegible]		[illegible]	19426
(Including Site Contingency)	[illegible]	[illegible]	56258	116558

PROJECT TOTAL
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	Personnel Cost	Equipment Cost	Other Cost	Total Cost
	[illegible]	[illegible]	[illegible]	[illegible]

CONTRACTOR AND GOVERNMENT
ALL COSTS BY TASK CODE

15 PAGES

REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION